

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF ADAM M. SLATER IN SUPPORT OF PLAINTIFFS'
MOTION TO PRECLUDE IMPROPER DEPOSITION DESIGNATIONS**

ADAM M. SLATER, hereby certify as follows:

1. I am an attorney at law within the State of New Jersey and a partner with the law firm of Mazie Slater Katz & Freeman, LLC, and serve as Plaintiffs' Co-Lead Counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' motion to preclude improper deposition designations.
2. Attached hereto as **Exhibit 1** is a true and accurate copy of ZHP's counsel's email serving affirmative deposition designations, dated February 2, 2024.
3. Attached hereto as **Exhibit 2** is a true and accurate copy of Teva's counsel's letter serving affirmative deposition designations, dated February 2, 2024.
4. Attached hereto as **Exhibit 3** is a true and accurate copy of Torrent's counsel's letter serving affirmative deposition designations, dated February 2, 2024.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: February 16, 2024